

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RELEVANT SPORTS, LLC,

Plaintiff,

v.

No. 1:19-cv-8359 (VEC)

FÉDÉRATION INTERNATIONALE DE
FOOTBALL ASSOCIATION and UNITED
STATES SOCCER FEDERATION, INC.,

Defendants.

DECLARATION OF DON GARBER

I, Donald P. Garber, hereby declare pursuant to 28 U.S.C. § 1746:

1. I am the Commissioner of Major League Soccer (“MLS”), the Chief Executive Officer of MLS’s marketing affiliate Soccer United Marketing (“SUM”), and a member of the board of directors of United States Soccer Federation, Inc. (“USSF”). I am also one of the 22 members of the FIFA Football Stakeholders Committee (the “Stakeholders Committee”). The statements in this declaration are based on my personal knowledge.

2. I submit this declaration to address certain assertions made by Relevant in its filings in this action regarding me. First, I have never been authorized by FIFA in any capacity to act as its agent, nor have I ever considered myself an agent of FIFA or sought to act as an agent of FIFA. Further to that point, I am not, and never have been authorized to, enter into contracts on FIFA’s behalf, bind FIFA, alter the legal relations between FIFA and any third parties, or make any statements on FIFA’s behalf.

3. Second, I am not and have never been a member of the FIFA Council. I understand the FIFA Council issued a press release on or about October 26, 2018 that “emphasized

the sporting principle that official league matches must be played within the territory of the respective member association" (the "2018 Press Release"). I did not vote for, authorize or participate in the drafting of the 2018 Press Release.

4. The purpose of the Stakeholders Committee, as I understand it, is to create a forum in which various stakeholders from around the world involved in soccer can discuss and advise on matters relating to the sport. The Stakeholders Committee is not a legislative body, and it has no power to bind FIFA, or any of its members. I am aware that on February 27, 2020, the Stakeholders Committee issued a statement in connection with its meeting in Zurich, Switzerland that endorsed the principle stated in the 2018 Press Release. I did not vote for, authorize, or participate in the drafting of that statement.

5. Third, at no time did I take any action on behalf of FIFA, whether in New York or otherwise, with respect to either Relevent's 2018 application to host a regular season game between two teams from La Liga in Miami, or its 2019 application to host a regular season league game between two teams from Ecuador's professional league in Miami.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on December 11, 2023.
New York, New York



Donald P. Garber